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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of  
Revision of the Commission's Rules )  
To Ensure Compatibility with )  
Enhanced 911 Emergency )  
Calling Systems )

CC Docket No. 94-102

To: Chief, Wireless Telecommunications Bureau

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QUARTERLY UPDATE TO REQUEST FOR WAIVER OF SECTION 20.18

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DiGiPH PCS, Inc. ("DiGiPH"), by its attorneys, hereby files a quarterly update to its request for rule waiver ("Waiver") of Section 20.18 of the Commission's Rules, pursuant to the FCC's Order released on November 13, 1998.<sup>1</sup> On December 4, 1998, DiGiPH filed for a waiver of Section 20.18 the Commission's rules regarding the transmission of 911 calls made from TTY devices using digital wireless systems on the basis that compliant subscriber equipment is not currently commercially available. The Commission granted DiGiPH a temporary waiver of Section 20.18, effective January 1, 1999.<sup>2</sup> In order to maintain its Waiver, DiGiPH must file quarterly updates to show what advances have been made in the development of commercially available equipment. In support thereof, the following is respectfully shown:

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<sup>1</sup>In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Order, rel. Nov. 13, 1998 ("Order I").

<sup>2</sup>In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Order, rel. Dec. 31, 1998 ("Order II").

To form the basis of its Waiver, DiGiPH requested that its infrastructure equipment vendor provide responses to all information set forth in Order I to meet the December 4, 1998 waiver deadline. As discussed in DiGiPH's original Waiver, DiGiPH respectfully submits that its network is capable today of meeting the requirements of Section 20.18 of the rules. As its infrastructure provider, Siemens, explains in Exhibit A attached hereto, it is only the lack of a handset interface device which precludes fully compliant service over DiGiPH's Siemens infrastructure at this time. Siemens explains that the GSM North America group is aware of this subscriber equipment issue and has formed a working group amongst the terminal vendors and operators headed by Karl Warfel of BellSouth DCS, to help resolve it. In light of the foregoing, it is respectfully submitted that DiGiPH, having met its obligations as a Commission licensee to deploy a network capable of providing the *service* required by Section 20.18 of the Commission's rules, should have its waiver of Section 20.18 extended until such time as the requisite subscriber equipment is commercially available.

In accordance with the terms of Order I,<sup>3</sup> DiGiPH will continue to update the requested information from its equipment vendor regarding progress on developing compliant subscriber equipment and submit such updates to extend this waiver request on a quarterly basis.<sup>4</sup> As soon as

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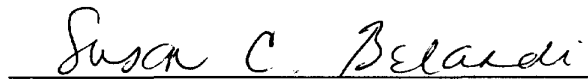
<sup>3</sup>In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Order, rel. Nov. 13, 1998 ("Order").

<sup>4</sup>Should the Commission desire to review technical information from DiGiPH's various subscriber equipment vendors, DiGiPH would be happy to provide such information upon the Commission's request.

compliant subscriber equipment is commercially available from its equipment vendor, DiGiPH intends to comply with Section 20.18 of the Commission's rules.

Respectfully submitted,

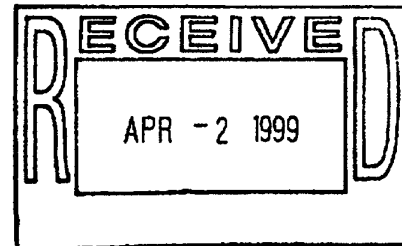
DiGiPH PCS, Inc.

A handwritten signature in cursive script, reading "Susan C. Belardi", is written over a horizontal line.

Dated: June 30, 1999

Michael K. Kurtis  
Susan C. Belardi  
Its Attorneys

Kurtis & Associates, P.C.  
2000 M Street, N.W.  
Suite 600  
Washington, D.C. 20036  
(202) 328-4500

**SIEMENS**

March 29, 1999

Mr. Dennis Kaiser  
President and CEO  
DigiPH PCS  
851 South Beltline Highway, Suite 804  
Mobile, AL 36606

Re: Compliance with FCC Requirements to Provide 911 TTY Access Over Digital Networks

Dear Mr. Kaiser:

Enclosed is the Siemens response to the DigiPH PCS questions as outlined in your letter to Mr. Roy Gunter dated March 25, 1999.

The Siemens infrastructure equipment provided to DigiPH PCS is capable, in its current form, of supporting the TTY devices, as required by the FCC. The TTY device's interface to the network is a traditional voice call and thus is transparent to the GSM infrastructure equipment. The interface between the handset and TTY devices must be standardized for the TTY user to connect their handset to the TTY device. In fact, the GSM North America group is aware of this issue and has formed a working group amongst the terminal vendors and operators headed by Karl Warfel of BellSouth DCS, to help resolve this interface issue.

Please contact me at (561)-955-8291 if you need additional information.

Sincerely,

G. Irizarry  
Business Manager, Wireless

**Siemens Information and Communication Networks, Inc.**

900 Broken Sound Parkway  
Boca Raton, Florida 33487

Tel: (561) 955-5000  
<http://www.icn.siemens.com>